

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
24CV041789-910

TELIA KIVETT; KARYN MULLIGAN;  
WAKE COUNTY REPUBLICAN PARTY;  
REPUBLICAN NATIONAL COMMITTEE;  
and NORTH CAROLINA REPUBLICAN  
PARTY,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD OF  
ELECTIONS; KAREN BRINSON BELL, in  
her official capacity as Executive Director of  
the North Carolina State Board of Elections;  
ALAN HIRSCH, in his official capacity as  
Chair of the North Carolina State Board of  
Elections; JEFF CARMON, in his official  
capacity as Secretary of the North Carolina  
State Board of Elections; STACY EGGERS  
IV, KEVIN N. LEWIS, and SIOBHAN  
O'DUFFY MILLEN, in their official  
capacities as members of the North Carolina  
State Board of Elections,

Defendants.

**NOTICE OF REMOVAL OF CIVIL  
ACTION No. 24CV041789-910 FROM  
WAKE COUNTY  
SUPERIOR COURT**

Defendants give notice to Plaintiffs that they have filed a notice of removal of the above-captioned civil action from the North Carolina Superior Court for Wake County to the United States District Court for the Eastern District of North Carolina. A copy of that notice and the exhibits to it are being filed along with this notice. Defendants also request that this Court forward to the United States District Court a complete copy of the state court file. *See* 28 U.S.C. § 1446(d).

This the 2nd day of January, 2025.

Mary Carla Babb  
Special Deputy Attorney General  
N.C. State Bar No. 25731  
[MCBabb@ncdoj.gov](mailto:MCBabb@ncdoj.gov)

Terence Steed  
Special Deputy Attorney General  
N.C. State Bar No. 52809  
[TSteed@ncdoj.gov](mailto:TSteed@ncdoj.gov)

North Carolina Department of Justice  
P.O. Box 629  
Raleigh, NC 27602  
Phone: 919-716-6900  
Fax: 919-716-6758

*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that I served this Notice of Removal on Plaintiffs by email addressed to his Attorneys of Record as follows:

Phillip J. Strach  
[phil.strach@nelsonmullins.com](mailto:phil.strach@nelsonmullins.com)  
Jordan Koonts  
[jordan.koonts@nelsonmullins.com](mailto:jordan.koonts@nelsonmullins.com)  
Nelson Mullins Riley & Scarborough LLP  
301 Hillsborough Street  
Suite 1400  
Raleigh, NC 27603  
(919) 329-3800

*Counsel for Plaintiffs*

This the 2nd day of January, 2025.

Electronically Submitted  
Mary Carla Babb  
Special Deputy Attorney General